



Wireless  
Infrastructure  
Association

September 28, 2017

**VIA ELECTRONIC FILING**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

**Re: Notice of *Ex Parte* Communication, Streamlining Deployment of Small Cell Infrastructure, WT Docket No. 16-421; Accelerating Wireless Broadband Deployment by Removing Barriers to Infrastructure Investment, WT Docket No. 17-79; Accelerating Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment, WC Docket No. 17-84**

Dear Ms. Dortch:

On September 26, 2017, Van Bloys, Sade Oshinubi, and the undersigned of the Wireless Infrastructure Association (WIA)<sup>1</sup> met with Garnet Hanly, Suzanne Tetreault, Donald Stockdale, Jeffrey Steinberg, David Sieradzki, Mary Claire York, Jill Springer, Erica Rosenberg (via telephone), Paul D'Ari (via telephone) of the Wireless Telecommunications Bureau and Adam Copeland of the Wireline Competition Bureau.

Consistent with its comments in the above-captioned proceedings, WIA emphasized the importance of the Federal Communications Commission's (FCC or Commission) efforts to reduce regulatory barriers to wireless infrastructure deployment. WIA encouraged the FCC to streamline the siting process to enhance capacity on 4G networks and spur the deployment of next-generation 5G networks through these proceedings.

WIA asked the FCC to reduce siting delay using its existing statutory authority under Sections 253 and 332 of the Telecommunications Act. To provide the connectivity necessary to meet exponentially increasing data demands, WIA discussed expediting the deployment of small cell infrastructure within public rights-of-way so long as the equipment met

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<sup>1</sup> The Wireless Infrastructure Association (WIA) is the principal organization representing companies that build, design, own, and manage telecommunications facilities throughout the world. WIA's members include carriers, infrastructure providers, and professional services firms.

defined height and volume limitations to maintain a responsible and transparent foundation in infrastructure deployment.<sup>2</sup> To reduce delay and provide meaningful relief for failure to act on facility siting applications, WIA urged the FCC to adopt a deemed granted remedy.<sup>3</sup> WIA asked the FCC to consider clarifying the process for upgrading sites using Section 6409(a) Eligible Facilities Requests based on misinterpretations of previously-issued Commission rules.

WIA also encouraged the FCC to streamline historic preservation and environmental review processes. WIA asked the FCC to swiftly clear Twilight Towers to further competitive broadband offerings and offer more opportunities for FirstNet collocations. Further, WIA sought adoption of finite timelines to reduce delays along with relief and standardization of Tribal fees, and modernization of the Tower Construction Notification System (TCNS). WIA also urged the FCC to eliminate the need to undergo additional historic preservation review for compound expansion within certain parameters.

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<sup>2</sup> See Comments of the Wireless Infrastructure Association, WT Docket No. 17-79, WC Docket No. 17-84 (filed Jun. 15, 2017) at 5 n.16 (“WIA Comments”) (describing a volume and height-based definition for “small wireless facility”).

<sup>3</sup> See WIA Comments at 15-20 (supporting the FCC’s proposed three-pronged approach and finding it consistent with the statutory text of Sections 332(c)(7)(B)(v), 201(b), 303(r), and 253(a) of the Communications Act).

WIA appreciates the FCC's attention to these important items and looks forward to continuing to work with the FCC to spur broadband deployment. Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter will be filed via ECFS and provided to each participant. Please do not hesitate to contact the undersigned with any questions.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Zach Champ".

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